



**Bridgestone Americas, Inc.**  
**200 4th Avenue South**  
**Nashville, TN 3701**

Jane M. Johnson  
615-937-1856

April 20, 2018

John Hopkins  
Land and Chemicals Division  
USEPA Region III  
1650 Arch Street (3LC20)  
Philadelphia, PA 19103

**Re: Quarterly Progress Report #37**  
January 1 – March 31, 2018  
Former Allied Signal Fibers Plant  
105 Winston Churchill Drive  
Hopewell, Virginia 23860  
USEPA ID# VAD003112588

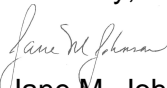
Dear Mr. Hopkins:

Attached, as required by Section II, Task IV of Facility Lead, Corrective Measures Implementation Agreement (FLA), please find the Quarterly Progress Report #37 for the time period of January 1 through March 31, 2018 for the above referenced site.

I certify under a penalty of law that Quarterly Progress Report #37 was prepared under my direction or supervision in accordance to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Please contact me if you have any questions or additional thoughts regarding the Quarterly Progress Report.

Sincerely,

  
Jane M. Johnson

Cc: Norm Kennel, EarthCon Consultants, Inc.

## **QUARTERLY PROGRESS REPORT #37**

**Former Allied Signal Fibers Plant  
Hopewell, Virginia  
USEPA ID#: VAD003112588**

### **Section 1 – Purpose of Quarterly Report**

This Quarterly Progress Report was prepared by Bridgestone Americas Tire Operations, LLC (BATO) to comply with BATO's reporting requirements under Section II, Task IV of Facility Lead, Corrective Measures Implementation Agreement (FLA), effective December 16, 2008, for the former Allied Signal Fibers Plant.

### **Section 2 - Introduction and Background**

The Former Allied Signal Fibers Plant consists of an approximately 37-acre parcel of land located at 105 Winston Churchill Drive in Hopewell, Virginia (site).

On February 22, 2006, United States Environmental Protection Agency (USEPA) issued a Notice of Intent to issue a Final Determination for the site. The proposed remedy was monitored natural attenuation with controls. The public comment period lasted 45 days, which ended on April 7, 2006. There were no comments on the proposed Final Determination.

During the development of the FLA, BATO, formerly Bridgestone Americas North American Tire, LLC, developed and submitted a CMI Work Plan (Groundwater Monitored Natural Attenuation Plan, dated August 18, 2008) to USEPA. On August 19, 2008, USEPA approved the CMI Work Plan. The CMI Work Plan was implemented in October 2008 when the baseline groundwater monitoring event was conducted.

On December 16, 2008, following the sale of the site, BATO submitted a Letter of Commitment to USEPA. The Letter of Commitment outlined the Sections of the FLA that BATO intends to comply with as the former Owner/Operator.

In a letter dated February 5, 2009, BATO indicated that the site work performed to date by BATO met the requirements of Section II; Tasks I, II, and III of the FLA. On February 5, 2009 USEPA indicated that they were in agreement with this assessment and that BATO would be required to complete progress reports in accordance with Section II, Task IV of the FLA.

The third and final CMI Work Plan required groundwater monitoring event was conducted in November 2010. The November 2010 sampling event concluded the required groundwater monitoring activities under the CMI Work Plan. In accordance with the CMI Work Plan, a Comprehensive Natural Attenuation Evaluation Report (CNAER) was prepared and was included in the Corrective Measures Completion Report (CMCR) which was sent to USEPA in April 2011. BATO received USEPA's comments in June 2011 and responded in July 2011 with a proposal to continue groundwater monitoring.

The EPA responded on August 4, 2011 that BATO's plans were sufficient to address the comments on the CMR. USEPA requested that groundwater samples be collected from the same groundwater monitoring wells utilized in the CMI Work Plan network (with the exception of

HPMW-04 which could be discontinued) and that BATO should submit the data to USEPA for evaluation of Site closure once two consecutive years of groundwater concentrations below the MCLs were received.

On August 9, 2016, EPA conducted a long-term stewardship site visit with BATO's environmental contractor and Dominion Virginia Power representatives to inspect some of the monitoring wells and discuss and assess the status of the remedy implementation at the site. On August 30, 2016 EPA issued a site visit follow-up Long-Term Stewardship Assessment Report (EPA Report) for the site. The August 30, 2016 EPA Report included the following:

*Conclusions and Recommendations: No EC/IC deficiencies were identified. EPA has determined that the remedy EC/ICs have been and are being implemented. EPA recommends that Firestone:*

- 1. Include historical trend graphs for exceeding constituents at monitoring wells ASMW-01R, ASMW-02 and ASMW-03 in future groundwater reports.*
- 2. Include concentration contours on a site map for exceeding constituents in future groundwater reports.*

In a letter dated September 18, 2017, following an analysis of groundwater data, BATO informed the EPA of its intent to amend the 2017 sampling plan by reducing the number of wells sampled and to discontinue analysis for 1,4-Dioxane. On November 1, 2017 EPA approved BATO's request to reduce the monitoring well network and constituents sampled indicating:

*For future sampling events, the monitoring well network will include ASMR-01R, ASMW-02, and ASMW-04. Also, 1,4-Dioxane is no longer required to be sampled.*

This Quarterly Progress Report was prepared to comply with the Section II, Task IV of FLA for the time period of January 1 through March 31, 2018. Section 3 of this Quarterly Progress Report summarizes work performed during this reporting period. Section 4 discusses any projected work for the next reporting period.

### **Section 3 – Work Performed during this Reporting Period**

Preparation of a work plan for the abandonment of the wells no longer used in the monitoring well network (i.e. all monitoring wells except ASMR-01R, ASMW-02, and ASMW-04).

### **Section 4 – Projected Work for next Reporting Period(s)**

Abandonment of the wells no longer used in the monitoring well network (i.e. all monitoring wells except ASMR-01R, ASMW-02, and ASMW-04).

The annual groundwater sampling event is scheduled to be performed in November 2018.